

Federal District Court - Ann Arbor District Court sitting
in the Easter District of the State of Michigan

Judge Levy Presiding

CASE # 17-cv-10164

Colleen Connors, Pro Se Interested Party/Plaintiff
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MOTION FOR JOINDER - IN OPPOSITION TO THE US EPA's MOTION TO DISMISS the "Meeks" Plaintiffs:

I, Colleen Connors, hereby file a Motion for Joinder in response/opposition to the US EPA's Motion to Dismiss the ADULT FTCA claimants as to "Meeks v. US EPA" in FWC case #17-cv-10164, which is primarily based upon the following:

1) The "Meeks" lead plaintiff apparently literally lives in Flint ZIP Code 48503 (i.e., which is to say that the TWO adult FTCA claims forms attached are from ADULTS who currently live in the SAME Flint ZIP Code -- 48503),

2) The US EPA.... has literally "SAT ON ITS RIGHTS" for too long now to request the District Court of such a HARSH result as "throwing away" of the Adult Plaintiffs' FTCA claims against the US EPA,

3) The TWO ...[new] FTCA claims from ADULTS do in FACT and LAW now "perfect" the ADULT "Meeks/ plaintiffs'" claims... because for lack of a better term... what "happened to the ADULT claimants/ plaintiffs" in attorney Corey Stern's EPA "paperwork --- of course then ALSO, happened to the TWO [new] affixed FTCA - EPA claimants/ plaintiffs (e.g. exposure to poisoned water, and carcinogens, etc...),

4) Here --- the exceptions to the "rule" of exhaustion of administrative remedies has and is already **mooted by the EPA's own motion for judgment on the pleadings**, which NOW must and should FAIL as a matter of law and fact,

5.) I did notify the FWC special master Deborah Greenspan, Attorney Corey Stern and US attorneys Eric Rey and Michael Williams of this motion; and I anticipate that the US EPA will not agree to my motion for joinder, and for that matter Mr. Stern may not either, however out of fundamental fairness and as a constitution right which I have to joinder and in the instant Meeks v. US EPA case it is my belief that the TWO adult FTCA - EPA claimants should be allowed to be "joindered".

Please give my request full and careful consideration.

Respectfully Submitted.

Thank You,

Date: December 13, 2022

Colleen M. Connors

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